

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX  
ADMINISTRATION OF THE KINGDOM  
OF DENMARK  
(SKATTERFORVALTNINGEN) TAX  
REFUND SCHEME LITIGATION

MASTER DOCKET

18-md-2865 (LAK)

This document relates to:

18-cv-07828; 19-cv-01785; 19-cv-01867;  
19-cv-01893; 19-cv-01781; 19-cv-01783;  
19-cv-01866; 19-cv-01895; 19-cv-01794;  
19-cv-01865; 19-cv-01904; 19-cv-01798;  
19-cv-01869; 19-cv-01922; 19-cv-01800;  
19-cv-01788; 19-cv-01870; 18-cv-07827;  
19-cv-01791; 19-cv-01792; 19-cv-01928;  
19-cv-01926; 19-cv-01868; 18-cv-07824;  
19-cv-01929; 19-cv-01803; 19-cv-01806;  
19-cv-01906; 19-cv-01801; 19-cv-01894;  
19-cv-01808; 19-cv-01810; 19-cv-01809;  
18-cv-04833; 19-cv-01911; 19-cv-01898;  
19-cv-01812; 19-cv-01896; 19-cv-01871;  
19-cv-01813; 19-cv-01930; 18-cv-07829;  
18-cv-04434; 19-cv-01815; 19-cv-01818;  
19-cv-01931; 19-cv-01918; 19-cv-01873;  
19-cv-01924; 19-cv-10713.

**DECLARATION OF MAXWELL W. BROWN IN OPPOSITION TO MOTION IN  
LIMINE**

I, Maxwell W. Brown, an attorney duly admitted to practice law before the  
courts of the State of New York, hereby declare under penalty of perjury:

1. I am an associate at Kostelanetz LLP, counsel for Azalea Pension Plan,  
Basalt Ventures LLC Roth 401(K) Plan, Bernina Pension Plan, Bernina Pension Plan

Trust, Michelle Investments Pension Plan, Omineca Pension Plan, Omineca Trust, Remece Investments LLC Pension Plan, Starfish Capital Management LLC Roth 401(K) Plan, Tarvos Pension Plan, Voojo Productions LLC Roth 401(K) Plan, Xiphias LLC Pension Plan, John van Merkensteijn, III, and Elizabeth van Merkensteijn in these actions. I am fully familiar with the matters set forth in this declaration.

2. I submit this declaration in support of Defendants' Memorandum of Law in Opposition to Plaintiff's Motion *in Limine* to Preclude Evidence Regarding Sven Nielsen's Criminal Conviction.

3. Attached hereto as Exhibit 1 are excerpts from the deposition of Lisbeth Romer, dated June 3, 2021.

4. Attached hereto as Exhibit 2 are excerpts from a copy of a document Bates-stamped SKAT\_MDL\_001\_00836384 and produced in discovery in this matter.

5. Attached hereto as Exhibit 3 are excerpts from the deposition of Dorthe Pannerup Madsen, dated September 30, 2021.

6. Attached hereto as Exhibit 4 are excerpts from the deposition of Christian Ekstrand, dated May 7, 2021.

7. Attached hereto as Exhibit 5 is a certified translation and original language copy of a document Bates-stamped SKAT\_MDL\_001\_00680764 and produced in discovery in this matter.

I, Maxwell W. Brown, declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
January 6, 2025

By: /s/ Maxwell W. Brown  
Maxwell W. Brown